

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

WILSON LEE GARRETT, JR.

Defendant

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CRIMINAL NO. AW-09-00265

**GOVERNMENT’S MOTION FOR COURT ORDER
TO OBTAIN STATE TAX RECORDS**

The United States of America, by and through its attorneys, Rod J. Rosenstein, United States Attorney for the District of Maryland, and Christen A. Sproule and James A. Crowell IV, Assistant United States Attorney for said District, comes now and files this motion to obtain state tax records that are responsive to a trial subpoena issued by the government, and in support thereof states the following:

A trial subpoena has been issued to the Comptroller of Maryland, General Accounting Division and Compliance Division, requesting certain records that are relevant to an upcoming trial in the above-referenced matter. A representative of the Comptroller of Maryland has indicated that certain of the records responsive to the subpoena were tax records, and as such, were protected by disclosure pursuant to Maryland General Tax Statute §13-202, which provides that state employees may not disclose state tax information. Exceptions to this statute are enumerated in Maryland General Tax Statute §13-203, which provides that “tax information may be disclosed in accordance with a proper judicial order or a legislative order.”

The Comptroller of Maryland has agreed to turn over the records responsive to the subpoena if this Court will issue an Order requiring it to do so. For the foregoing reasons, the

United States respectfully requests that this Court issue the attached Order requiring the Comptroller of Maryland to comply with the previously issued trial subpoena.

Respectfully submitted,

ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

By: /s/ James Crowell
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Dated: February 18, 2011